

REDACTED- FOR PUBLIC INSPECTION

June 26, 2015

VIA OVERNIGHT DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554

RE: **Confidential Financial Information Subject to Protective Order in WC Docket Nos. 14-58, 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Before the Federal Communications Commission**

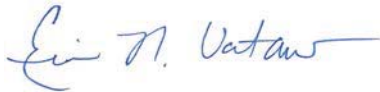
Dear Ms. Dortch:

South Arkansas Telephone Company, a privately-held rate of return carrier receiving high cost support, has electronically submitted FCC Form 481 to the Commission with redacted financial data, in compliance with 47 C.F.R. §§ 54.313 and 54.422

As specified in the Protective Order issued on November 16, 2012 by the Commission, two copies of the redacted confidential information are being filed simultaneously with the non-redacted confidential information. The redacted information for this filing and each page of the file where confidential information has been omitted is marked "REDACTED - FOR PUBLIC INSPECTION"

Please feel free to contact me with any questions regarding this particular matter.

Sincerely,



Eric N. Votaw, Senior Manager for
Moss Adams LLP

Enclosures

cc Mr. Charles Tyler, FCC Telecommunications Access Policy Division
Mr. Greg Ashcroft - South Arkansas Telephone Company
Arkansas Public Utility Commission - Redacted Filing

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010>	Study Area Code	401702
<015>	Study Area Name	SOUTH ARKANSAS TEL
<020>	Program Year	2016
<030>	Contact Name: Person USAC should contact with questions about this data	Eric N. Votaw
<035>	Contact Telephone Number: Number of the person identified in data line <030>	2099556116 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	eric.votaw@mossadams.com

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
(check box when complete)			
<100>	Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>
<200>	Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>
<210>	<input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>
<300>	Unfulfilled Service Requests (voice)	0	
<310>	Detail on Attempts (voice)	(attach descriptive document)	
<320>	Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>
<330>	Detail on Attempts (broadband)	(attach descriptive document)	
<400>	Number of Complaints per 1,000 customers (voice)		
<410>	Fixed	0.0	<input checked="" type="checkbox"/>
<420>	Mobile	0.0	<input checked="" type="checkbox"/>
<430>	Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>
<440>	Fixed	0.0	
<450>	Mobile	0.0	
<500>	Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>
<510>	401702AR510.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>
<600>	Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>
<610>	401702AR610.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>
<700>	Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>
<710>	Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>
<800>	Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>
<900>	Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	
<1000>	Voice Services Rate Comparability Certification	Yes	<input checked="" type="checkbox"/>
<1010>	401702AR1010.pdf	(attach descriptive document)	<input checked="" type="checkbox"/>
<1100>	Certify whether terrestrial backhaul options exist (Yes or No)	(if not, check to indicate certification)	<input checked="" type="checkbox"/>
<1110>		(complete attached worksheet)	<input checked="" type="checkbox"/>
<1200>	Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

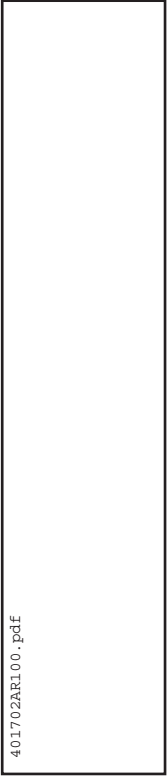
<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>

(100) Service Quality Improvement Reporting Data Collection Form	
FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	

<010>	Study Area Code	401702
<015>	Study Area Name	SOUTH ARKANSAS TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data Eric N. Votaw	
<035>	Contact Telephone Number - Number of person identified in data line <030> 2099556116 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030> eric.votaw@mossadams.com	
<110>	Has your company received its ETC certification from the FCC? If your answer to Line <110> is yes, do you have an existing "5 year plan" filed with the FCC?	<input checked="" type="radio"/> (yes / no) <input type="radio"/>
<111>		<input type="radio"/> (yes / no) <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.



Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	<table><tr><td>Yes</td></tr></table>	Yes
Yes			
<114>	Report how much universal service (USF) support was received	<table><tr><td>Yes</td></tr></table>	Yes
Yes			
<115>	How much (USF) was used to improve service quality and how support was used to improve service quality	<table><tr><td>Yes</td></tr></table>	Yes
Yes			
<116>	How much (USF) was used to improve service coverage and how support was used to improve service coverage	<table><tr><td>Yes</td></tr></table>	Yes
Yes			
<117>	How much (USF) was used to improve service capacity and how support was used to improve service capacity	<table><tr><td>Yes</td></tr></table>	Yes
Yes			
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	<table><tr><td>Not Applicable</td></tr></table>	Not Applicable
Not Applicable			

(900) Tribal Lands Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	401702
<015>	Study Area Name	SOUTH ARKANSAS TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Eric N. Votaw
<035>	Contact Telephone Number - Number of person identified in data line <030>	2099556116 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	eric.votaw@mosadams.com

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

(1100) No Terrestrial Backhaul Reporting		FCC Form 481	
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819	
		July 2013	

<010>	Study Area Code	401702
<015>	Study Area Name	SOUTH ARKANSAS TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Eric N. Votaw
<035>	Contact Telephone Number - Number of person identified in data line <030>	2099556116 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	eric.votaw@mossadams.com

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers		FCC Form 481	
Lifeline		OMB Control No. 3060-0986/OMB Control No. 3060-0819	
Data Collection Form		July 2013	

<010>	Study Area Code	401702
<015>	Study Area Name	SOUTH ARKANSAS TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Eric N. Votaw
<035>	Contact Telephone Number - Number of person identified in data line <030>	2099556116 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	eric.votaw@mossadams.com

401702AR1210.pdf

Name of Attached Document

<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	
<1220>	Link to Public Website	HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

<p>(2000) Price Cap Carrier Additional Documentation</p> <p>Data Collection Form</p> <p><i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i></p>	<p>FCC Form 481</p> <p>OMB Control No. 3060-0986/OMB Control No. 3060-0819</p> <p>July 2013</p>
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<010>	Study Area Code	
<015>	Study Area Name	401702
<020>	Program Year	SOUTH ARKANSAS TEL
<030>	Contact Name - Person USAC should contact regarding this data	2016
<035>	Contact Telephone Number - Number of person identified in data line <030>	EFIC N. VOTAW
<039>	Contact Email Address - Email Address of person identified in data line <030>	2099566116 EXL. EFIC.VOTAW@OESADAMS.COM

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

	Incremental Connect America Phase I reporting	
<2010>	2nd Year Certification {47 CFR § 54.313(b)(1)ii}	<div style="border: 1px solid black; height: 100px; width: 100%;"></div>
<2011a>	3rd Year Certification {47 CFR § 54.313(b)(1)iii}	
<2011b>	Attachment {47 CFR § 54.313(b)(1)ii}	
		Name of Attached Document(s) Listing Required Information

<2012>	Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}	
<2013>	2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)}	
<2013>	2014 Frozen Support Calculation {47 CFR § 54.313(c)(2)}	
<2014>	2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)}	
<2015>	2016 and future Frozen Support Calculation {47 CFR § 54.313(c)(4)}	
<2016>	Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}	
	Certification Support Used to Build Broadband	
<2017>	Connect America Phase II Reporting {47 CFR § 54.313(e)}	
<2017>	3rd year Broadband Service Certification	
<2018>	5th year Broadband Service Certification	
<2019>	Interim Progress Certification	
<2020>	Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(iii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	
<2021>	Interim Progress Community Anchor Institutions	

Name of Attached Document(s) Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	401702
<015>	Study Area Name	SOUTH ARKANSAS TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Erie N. Votaw
<035>	Contact Telephone Number - Number of person identified in data line <030>	2099556116 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	eric.votaw@mosadams.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010)

Progress Report on 5 Year Plan

Milestone Certification (47 CFR § 54.313(f)(1)(ii))

401702AR3010.pdf

Name of Attached Document Listing Required Information

(3011)

Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

☐

(3012)

Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

(3013)

Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))

(3014)

If yes, does your company file the RUS annual report

☒

(Yes/No)

☒

(Yes/No)

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015)

Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

☒

(3016)

Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☒

(3017)

If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

401702AR3017.pdf

Name of Attached Document Listing Required Information

☐

(Yes/No)

☐

(Yes/No)

If the response is no on line 3014, Is your company audited?

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

(3019)

Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

☐

(3020)

Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

(3021)

Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit

☐

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022)

Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,

☐

(3023)

Underlying information subjected to a review by an independent certified public accountant

☐

(3024)

Underlying information subjected to an officer certification.

☐

(3025)

Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

(3026)

Attach the worksheet listing required information

Name of Attached Document Listing Required Information

LINE 3000 RATE OF RETURN DATA

REDACTED FOR PUBLIC INSPECTION

**Certification - Reporting Carrier
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	eric.votaw@mossadams.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	401702
<015> Study Area Name	SOUTH ARKANSAS TEL
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Eric N. Votaw
<035> Contact Telephone Number - Number of person identified in data line <030>	2099556116 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	eric.votaw@mossadams.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>Moss Adam, LLP</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	<u>Moss Adam, LLP</u>
Name of Reporting Carrier:	<u>SOUTH ARKANSAS TEL</u>
Signature of Authorized Officer:	<u>CERTIFIED ONLINE</u> Date: <u>06/29/2015</u>
Printed name of Authorized Officer:	<u>Greg Ashcraft</u>
Title or position of Authorized Officer:	<u>Secretary/Treasurer</u>
Telephone number of Authorized Officer:	<u>8709424344 ext.</u>
Study Area Code of Reporting Carrier:	<u>401702</u> Filing Due Date for this form: <u>07/01/2015</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	<u>SOUTH ARKANSAS TEL</u>
Name of Authorized Agent or Employee of Agent:	<u>Moss Adams, LLP</u>
Signature of Authorized Agent or Employee of Agent:	<u>CERTIFIED ONLINE</u> Date: <u>06/29/2015</u>
Printed name of Authorized Agent or Employee of Agent:	<u>Eric N. Votaw</u>
Title or position of Authorized Agent or Employee of Agent:	<u>Senior Manager</u>
Telephone number of Authorized Agent or Employee of Agent:	<u>2099556116 ext.</u>
Study Area Code of Reporting Carrier:	<u>401702</u> Filing Due Date for this form: <u>07/01/2015</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

LINE 100 INITIAL FIVE-YEAR SERVICE QUALITY IMPROVEMENT PLAN

REDACTED FOR PUBLIC INSPECTION

Response Line 510
South Arkansas Telephone Company
Study Area 401702

Voice Network

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) South Arkansas Telephone Company ("ILEC") is in compliance with appropriate FCC Service Quality Standards and Consumer Protection Rules. ILEC provides CPNI training to all of its new employees and in addition trains all of its existing employees on an annual basis. ILEC also conducts subscriber outreach regarding CPNI by placing CPNI explanation messages into subscribers' bills and also has signage in its business office, which informs subscribers about CPNI rules and other applicable customer rights and obligations. In addition, ILEC trains staff on Red Flag issues on an annual basis. All company employees are required to sign and acknowledge that they have completed CPNI and Red Flag training and understand obligations to adherence of applicable rules.

ILEC also outlines its rates, terms, and conditions under which ILEC offers service in its Local Exchange Tariff. The tariff explains customer rights and obligations, customer service, dispute resolution, deposits, billing and payment options, disconnection of service as well as cancellation of service options. ILEC keeps its tariffs available for public inspection at its business offices.

Broadband Network

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) ILEC is in compliance with applicable FCC Service Quality Standards and Consumer Protection Rules. ILEC trains staff on applicable rules for broadband services issues on an annual basis. In addition SATCO has placed on its website at <http://www.sat-co.net/pdfs/OpenNetworkManagementPolicy110911.pdf> its network management policies.

ILEC also outlines its rates, terms, and conditions under which ILEC offers Broadband service in NECA Tariff #5 to Internet Service Providers ("ISP"). The Tariff explains customer rights and obligations, customer service, dispute resolution, deposits, billing and payment options, disconnection of service as well as cancellation of service options. Public inspection of NECA Tariff #5 can be found on NECA's website. Retail DSL rates, terms, and conditions for retail services are provided by the ISP.

Response Line 610
South Arkansas Telephone Company
Study Area 401702

Functionality in Emergency Situations:

Voice Network

Pursuant to 47 C.F.R. § 54.313(a)(6) and 47 C.F.R § 54.22(b)(4) as set forth in 47 C.F.R. § 54.202(a)(2) South Arkansas Telephone Company ("ILEC") meets the requirements to remain functional in emergency situations and has the following capabilities: Back-up power is provided to Hampton, Banks, Hermitage, and Louann central offices by use of a fixed generator and batteries that provide it with 12 hours of emergency power. In addition, ILEC field electronics have 8 hours of back-up power by use of generators and batteries. ILEC also has ATM technology deployed in its core fiber optic network that is self-healing and will automatically reroute traffic should a fiber cut occur. ILEC has also sufficient spare cards for its fiber optic network to provide almost instantaneous replacement should there ever be a card failure in the core network. ILEC also has proper staff in place to repair any fiber cuts in a timely manner. ILEC has connectivity with neighboring telephone exchanges as well as the LATA tandem to provide diverse options to reroute traffic should an emergency arise. ILEC has developed and trained its staff on network preparedness plans in case of emergency situations. ILEC is prepared and capable of managing traffic spikes resulting from emergency situations and has sufficient switching capabilities to handle such situations.

Broadband Network

Pursuant to 47 C.F.R. § 54.313(a)(6) and 47 C.F.R § 54.22(b)(4) as set forth in 47 C.F.R. § 54.202(a)(2) South Arkansas Telephone Company ("ILEC") meets the requirements to remain functional in emergency situations and has the following capabilities: Back-up power is provided to ILEC central offices by use of a generator and batteries that provide it with 8 to 12 hours of emergency power that is also used to provide service to the broadband network. In addition, ILEC field electronics have 8 to 12 hours of back-up power by use of generators and batteries. ILEC also has ATM technology deployed in its core fiber optic network that is a self-healing and will automatically reroute broadband traffic should a fiber cut occur. ILEC has also sufficient spare cards for its fiber optic network to provide almost instantaneous replacement should there ever be a card failure in the core network. ILEC also has proper staff in place to repair any fiber cuts in a timely manner. ILEC has connectivity with neighboring telephone exchanges as well as the LATA tandem to provide diverse options to reroute traffic should an emergency arise. ILEC has developed and trained its staff on network preparedness plans in case of emergency situations.

Response to Line 1010
South Arkansas Telephone
Study Area 401702

Voice Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (10) South Arkansas Telephone (“SATCO”) is in compliance with the requirement that voice services is no more than two standard deviations above the national average urban rate for voice service of \$47.48 as specified in Public Notice DA 15-470 issued on April 16, 2015. SATCO’s current total local end-user rate¹ of \$16.22 in all exchanges (which includes a local fee of \$15.45, mandated state fees of .77 and mandatory extended area service charges of \$0.00) is not above the standard deviation as specified in the USF/ICC Transformation Order.²

¹ Local End User Rate as defined in USF/ICC Transformation Order 26 FCC Rcd at 17751, Para. 238

² USF/ICC Transformation Order, 26 FCC Rcd at 17694, Para. 84 (footnote included) “The standard deviation is a measure of dispersion. The sample standard deviation is the square root of the sample variance. The sample variance is calculated as the sum of the squared deviations of the individual observations in the sample of data from the sample average divided by the total number of observations in the sample minus one. In a normal distribution, about 68 percent of the observations lie within one standard deviation above and below the average and about 95 percent of the observations lie within two standard deviations above and below the average.”

ARKANSAS PUBLIC SERVICE COMMISSION

SECTION V

THIRD REVISED SHEET 7

ALL EXCHANGES

SOUTH ARKANSAS TELEPHONE COMPANY

LOCAL EXCHANGE SERVICE (CONT.)

10. LIFELINE ASSISTANCE PROGRAM

10.1 General

- 10.1.1 This tariff is effective on the date the new FCC rules on Lifeline become effective, August 1, 2012. Until that time, the existing Lifeline tariff of this ETC remains effective.
- 10.1.2 The Lifeline Assistance Program (hereinafter "Lifeline") is a retail local service offering designed to make telephone service available at reduced rates to qualifying low-income customers. Lifeline provides for a federal credit equal to 100% of the Interstate Subscriber Line Charge and a \$2.75 local service reduction.
- 10.1.3 The discounts apply to monthly recurring rates for qualifying residential customers.
- 10.1.4 Discounts are applied to rates and charges for residential telephone service.
- 10.1.5 The lifeline Programs rate reductions do not apply to long distance service, class services, special features, and other ancillary services which may or may not be tariffed. Eligible customers may obtain these services, where available, at their discretion.
- 10.1.6 This ETC will implement all special disconnect procedures required for Lifeline customers.
- 10.1.7 This ETC shall not charge Lifeline customers with a monthly Number-Portability charge.
- 10.1.8 This ETC shall offer toll blocking to all qualifying applicants at the time such consumers subscribe to Lifeline service. If the consumer elects to receive toll blocking, that service shall become part of that consumer's Lifeline service. The customer is under no obligation to accept the subscription to toll blocking.

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SOUTH ARKANSAS TELEPHONE COMPANY

LOCAL EXCHANGE SERVICE (CONT.)

10. LIFELINE ASSISTANCE PROGRAM (CONT.)

10.1 General (CONT.)

- 10.1.9 This ETC shall not collect a service deposit in order to initiate Lifeline service, if the qualifying consumer voluntarily elects toll blocking, where available, otherwise, this ETC may charge a service deposit in the ordinary course of business.

10.2 DESIGNATED LIFELINE PROGRAM SERVICE

10.2.1 General

10.2.1.1 Certain telephone services are specifically part of Lifeline service. Other services are optional. This ETC has a specific Lifeline offering.

- 10.2.2 This ETC shall offer the following services or functionalities defined to be qualified or designated, Lifeline Program services:

1. Single party service
2. Local Usage
3. Voice-grade access to the public network
4. Dual tone multi-frequency (DTMF) signaling or its functional equivalent
5. Access to emergency services
6. Access to operator services
7. Access to interexchange services
8. Access to directory assistance services
9. Toll Blocking service

10.3 REGULATIONS

- 10.3.1 All the telecommunications provider rules and general tariffs of this company apply to lifeline service unless specifically in conflict with this section and schedule.
- 10.3.2 Lifeline Service is available only with residence services, excluding foreign exchange service.

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ALL EXCHANGES

SOUTH ARKANSAS TELEPHONE COMPANY

LOCAL EXCHANGE SERVICE (CONT.)

10. LIFELINE ASSISTANCE PROGRAM (CONT.)

10.3 REGULATIONS (CONT.)

10.3.3 Lifeline Service is limited to one line per household at the customer's primary residence.

10.4 QUALIFICATIONS

10.4.1 General

10.4.1.1 To qualify for Lifeline Service, applicants must be participants in certain government programs or qualify through a low income threshold.

10.4.2 Qualification through Governmental Program Participation

10.4.2.1 To qualify for Lifeline Service through governmental program participation, applicants must participate in at least one (1) of the following government programs:

1. Department of Housing and Urban Development
2. Medicaid
3. Food Stamps
4. Supplemental Security Income (SSI)
5. Federal Public Housing Assistance Program
6. Low Income Home Energy Assistance Program
7. Temporary Assistance for Needy Families (TANF)
8. National School Lunch (NSL) Program's Free Lunch Program

10.4.3 Qualification through low income eligibility

10.4.3.1 To qualify through low income eligibility the applicant's income as defined in Sec. 54.400(f) must be at or below 135% of the federal poverty guidelines.

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ALL EXCHANGES

SOUTH ARKANSAS TELEPHONE COMPANY

LOCAL EXCHANGE SERVICE (CONT.)

10. LIFELINE ASSISTANCE PROGRAM (CONT.)

10.5 CERTIFICATION

10.5.1 General

10.5.1.1 Applicants for Lifeline must meet the eligibility guidelines. A certification process shall be used to ensure only eligible applicants receive Lifeline service.

10.5.2 Certification of eligibility through low income qualification.

10.5.2.1 This ETC participates in the ALIVE Board program established by the Arkansas General Assembly in 2005 through Act 2289 of 2005 to provide a governmentally maintained income qualification certification process that includes self-certification by applicants, under penalty of perjury, that the documentation presented by the applicant accurately represents their annual household income and provides the number of individuals in the household.

10.5.2.2 This ETC shall monitor the ALIVE Board to ensure the ALIVE Board provides this ETC with a copy of procedures. This ETC shall review the procedures to ensure the procedures are appropriate to certify and document income based on eligibility for Lifeline enrollment. An officer of ETC shall monitor the ALIVE Board certification process and procedures and shall certify at time of enrollment, under penalty of perjury, to the best of the officer's knowledge, that this ETC has procedures in place to review documentation via the ALIVE Board, and that the ETC, via the ALIVE Board, was presented with documentation that confirms the consumer's household eligibility, in that the consumer's household income is at or below 135% of the Federal Poverty Guidelines.

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SOUTH ARKANSAS TELEPHONE COMPANY

LOCAL EXCHANGE SERVICE (CONT.)

10. LIFELINE ASSISTANCE PROGRAM (CONT.)

10.5 CERTIFICATION (CONT.)

10.5.3 Certification of eligibility through participation in governmental programs.

10.5.3.1 The applicant's eligibility for Lifeline Service due to participation in governmental programs shall be certified by the applicant in coordination with the governmental entity providing, monitoring, or reviewing program participation. For instance, many programs may be provided the Department of Human Services, Department of Health, and local school districts. This ETC, through the ALIVE Board or the third-party, will coordinate with the applicant and the appropriate governmental entity to ensure proper certification. This ETC shall require the third-party to establish appropriate procedures that include self-certification by applicants, under penalty of perjury, that the applicant receives benefits from the eligibility programs and identify the program or programs from which the applicant receives benefits. The certifying document shall also include the requirement that the consumer will notify this ETC if the consumer ceases to participate in the program or programs.

10.6 CONSUMER COMPLAINT RESOLUTION

10.6.1 General

10.6.1.1 The Federal Lifeline Program requires a consumer complaint resolution process. The Arkansas Public Service Commission has determined in Order No.1 of Docket No. 05-038-U that any ETC, which maintains tariffs and is subject to the Public Service Commission's consumer complaint procedures, meet the dispute resolution requirements for Lifeline. This ETC is subject to the Public Service Commission's consumer complaint procedures and shall use the Public Service Commission's consumer complaint

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SOUTH ARKANSAS TELEPHONE COMPANY

LOCAL EXCHANGE SERVICE (CONT.)

10. LIFELINE ASSISTANCE PROGRAM (CONT.)

10.6 CONSUMER COMPLAINT RESOLUTION (CONT.)

procedures to meet the dispute resolution requirement for Lifeline. This ETC is subject to the Public Service Commission's consumer complaint procedures and shall use the Public Service Commission's consumer complaint procedures to meet the dispute resolution requirements for Lifeline.

10.7 VERIFICATION OF CONTINUED ELIGIBILITY

10.7.1 General

10.7.1.1 The Lifeline Programs requires this ETC to annually monitor the continued eligibility of Lifeline participants by evaluating a statistically valid sample of Lifeline customers and report the results of the sample evaluations to USAC.

10.7.2 This ETC shall follow all federal procedures in defining the statistically valid sample and evaluating the eligibility of the participants in the random sample.

10.7.2.1 Subscribers who are part of the random sample and qualify through program based eligibility must prove their continued eligibility by presenting, in person, or sending a copy of their Medicaid card, other Lifeline-qualifying public assistance card, or other authorized documentation to establish continued eligibility in an approved program and must self certify under penalty of perjury that they continue to participate in the Lifeline qualifying public assistance program.

10.7.2.2 Subscribers who are part of the random sample and qualify through income-based eligibility must prove their continued eligibility by presenting, to the ALIVE Board or the third party contractor, current documentation consistent with the procedures set forth above. These subscribers with income-based eligibility, must self certify, under penalty of perjury, the number of

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SOUTH ARKANSAS TELEPHONE COMPANY

LOCAL EXCHANGE SERVICE (CONT.)

10. LIFELINE ASSISTANCE PROGRAM (CONT.)

10.7 VERIFICATION OF CONTINUED ELIGIBILITY (CONT.)

individuals in their household and that the documentation presented accurately represents their annual household income.

10.8 PROCESS FOR TERMINATION OF LIFELINE BENEFITS

10.8.1 General

10.8.1.1 A consumer's eligibility for Lifeline may be terminated due to failure to maintain qualifications for Lifeline. This ETC shall follow the required process for termination of Lifeline benefits.

10.8.2 Process

10.8.2.1 Customers will be notified of the impending termination of Lifeline benefits in a letter separate from the consumer's monthly bill.

10.8.2.2 The customer will have up to sixty (60) days from the date of the termination letter in which to demonstrate his or her continued eligibility before Lifeline Support is discontinued.

10.8.2.3 A customer who appeals must present proof of continued eligibility consistent with the above Lifeline qualifications.

10.8.2.4 This ETC will terminate Lifeline services for subscribers who fail to demonstrate continued eligibility within the sixty (60) day time period.

10.9 RECORD RETENTION POLICY

10.9.1 General

10.9.1.1 The Federal Communications Commission has established specific record retention requirements for the Lifeline certification process.

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SOUTH ARKANSAS TELEPHONE COMPANY

LOCAL EXCHANGE SERVICE (CONT.)

10. LIFELINE ASSISTANCE PROGRAM (CONT.)

10.9 RECORD RETENTION POLICY (cont.)

This ETC will have specific procedures to ensure its record retention policy complies with legal requirements.

10.9.2 This ETC, through its own recordkeeping or through the recordkeeping of the ALIVE Board and its third-party contractor on behalf of this ETC, shall maintain certification records for the period of time required by the Federal Communications Commission for all Lifeline Participants.

10.9.3 This ETC shall retain certifications, signed by the subscriber, regarding the consumer's eligibility for Lifeline, including self-certifications, that income documentation accurately reflects the household income. This certification shall be retained at least as long as the consumer receives Lifeline service from this ETC or until this ETC is audited by the Administrator. This ETC shall maintain certifications for subscribers terminating Lifeline service for at least three (3) years after termination. Such records shall be maintained in compliance with all federal and Public Service Commission requirements and such records shall be provided to the Administrator or the Public Service Commission upon proper request.

Response to Line3010
South Arkansas Telephone Company
Study Area 401702

Milestone Certification

Pursuant to 47 C.F.R. § 54.202(a) South Arkansas Telephone Company ("SATCO") provides this certification that it is taking reasonable steps to provide upon reasonable request broadband speeds of at least 4 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to offerings in urban areas as determined in an annual survey as specified in Public Notice DA 15-470, and that requests for such service are met within a reasonable amount of time. Details for how SATCO is meeting its obligations for broadband goals and required obligations are specified within the FCC Form 481 annual filing.

LINE 3005 RATE OF RETURN DATA

REDACTED FOR PUBLIC INSPECTION